

PCM3.28.22
AM USAO#2021R00438

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

MARK RYALS,

Defendant

CRIMINAL NO. CCB-21-373

(Possession of Unregistered Firearms,
26 U.S.C. § 5861(d); Engaging in the
Business of Dealing in Firearms
Without a License, 18 U.S.C. §
922(a)(1)(A); Possession of a Firearm
and Ammunition by a Prohibited
Person, 18 U.S.C. § 922(g)(8);
Forfeiture, 18 U.S.C. § 924(d), 28
U.S.C. § 2461(c), and 26 U.S.C. § 5872)

SUPERSEDING INDICTMENT

COUNT ONE

(Possession of an Unregistered Silencer)

The Grand Jury for the District of Maryland charges that:

On or about July 15, 2021, in the District of Maryland, the Defendant,

MARK RYALS,

unlawfully and knowingly possessed a silencer as defined in 26 U.S.C. § 5845(a), that is, an AWC Systems Technology Model Stalker.17, .17 caliber firearm silencer, bearing serial number 091570, that was not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5845(a), 5861(d), and 5871.

26 U.S.C. § 5841
26 U.S.C. § 5845(a)
26 U.S.C. § 5861(d)
26 U.S.C. § 5871

COUNT TWO
(Possession of an Unregistered Firearm)

The Grand Jury for the District of Maryland further charges that:

On or about August 12, 2021, in the District of Maryland, the Defendant,

MARK RYALS,

unlawfully and knowingly possessed a firearm as defined in 26 U.S.C. § 5845(a), that is, a High (Hi) Std., J.C. Higgins 583 .23, 12-gauge shotgun, having a barrel of less than 18 inches in length, that was not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5845(a), 5861(d), and 5871.

26 U.S.C. § 5841

26 U.S.C. § 5845(a)

26 U.S.C. § 5861(d)

26 U.S.C. § 5871

COUNTS THREE THROUGH EIGHT
(Engaging in the Business of Dealing in Firearms Without a License)

The Grand Jury for the District of Maryland charges that:

On or about the dates set forth below, in the District of Maryland, the defendant,

MARK RYALS,

not being a licensed dealer, importer, or manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing and manufacturing firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D):

| Count | Date |
|-------|---------|
| 3 | 7/14/21 |
| 4 | 7/15/21 |
| 5 | 7/19/21 |
| 6 | 7/26/21 |
| 7 | 8/2/21 |
| 8 | 8/3/21 |

18 U.S.C. § 922(a)(1)(A)

18 U.S.C. § 923(a)

18 U.S.C. § 924(a)(1)(D)

COUNTS NINE THROUGH ELEVEN
(Possession of a Firearm and Ammunition by a Prohibited Person)

The Grand Jury for the District of Maryland charges that:

On or about the dates set forth below, in the District of Maryland, the defendant,

MARK RYALS,

knowing he was subject to a court order issued by the District Court of Maryland for Baltimore County, on June 30, 2021, Case No. D-08-FM-20-816028, that was issued after a hearing of which he received actual notice, and at which he had an opportunity to participate, restraining him from harassing, stalking, or threatening an intimate partner, that by its terms explicitly prohibited the use, attempted use or threatened use of physical force against such intimate partner that would reasonably be expected to cause bodily injury, did knowingly possess in and affecting commerce, the following firearms, in violation of Title 18, United States Code, Sections 922(g)(8) and 924(a)(2):

| Count | Date | Firearm(s) |
|--------------|-------------|--|
| 9 | 7/14/21 | a Norinco SKS, 7.62x39mm M43 rifle bearing serial number 10426622 |
| 10 | 7/15/21 | a AWC Systems Technology Model Stalker.17, .17 caliber firearm silencer bearing serial number 091570 |
| 11 | 8/12/21 | a High (Hi) Std., J.C. Higgins 583 .23, 12-gauge shotgun |

18 U.S.C. § 922(g)(8)

18 U.S.C. § 924(a)(2)

FORFEITURE

The Grand Jury for the District of Maryland further finds that:

1. All allegations set forth in Counts One through Eleven are hereby incorporated by reference.
2. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 28 U.S.C. § 2461(c) and the other statutes cited herein, in the event of the defendants' convictions.

Firearms and Ammunition Forfeiture

3. Pursuant to 18 U.S.C. § 924(d) and 26 U.S.C. § 5872, upon conviction of the offenses alleged in Counts One through Eleven of this Indictment, the defendant(s) convicted of such offense(s) shall forfeit to the United States any firearms and ammunition involved in the offense(s).

Property Subject to Forfeiture

4. The property to be forfeited includes, but is not limited to, the following:
 - a. a Norinco SKS, 7.62x39mm M43 rifle bearing serial number 10426622,
 - b. an AWC Systems Technology Model Stalker.17, .17 caliber firearm silencer, bearing serial number 091570,
 - c. a High (Hi) Std., J.C. Higgins 583 .23, 12-gauge shotgun,
 - d. thirteen Polymer80 PF940C, 9mm luger pistols,
 - e. two Polymer80 PF940V2, 9mm luger pistols, and
 - f. six Polymer80 PF940SC, 9mm luger pistols.

18 U.S.C. § 924(d)
28 U.S.C. § 2461(c)
26 U.S.C. § 5872



Erek L. Barron
United States Attorney

A TRUE BILL

SIGNATURE REDACTED

Foreperson



Date